ORIGINAL
FILE

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In the matter of	)	
	)	
Advanced Television Systems	)	
and Their Impact upon the	)	MM Docket No. 87-268
Existing Television	)	
Broadcast Service	)	

TO: The Commission

COMMENTS

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On behalf of 25 Television Stations

November 16, 1992

SUMMARY

The proposals under consideration in connection with ATV allotment and implementation will result in a costly, high-risk restructuring of the television broadcast industry. They will result in a forced migration to the UHF band, reduced service contours for many stations, and huge capital costs and increased operating expenses for all stations -- all without any assurance that the new technology will gain a critical mass of consumer acceptance.

In moving relentlessly and rigidly toward implementation of an all-UHF, 55-mile contour ATV service without taking into consideration the present realities of the marketplace -- increased competition, declining audience shares, decreased cash flows and lower sales multiples -- the Commission is placing in jeopardy the future of this country's over-the-air television system.

The Commission's rigid ATV timetable fails in many respects: it fails to distinguish between small and large market stations; it fails to consider the costs -- in reduced coverage, reduced advertising revenues and increased operating expenses -- to VHF stations forced to switch to UHF operation; and it fails to acknowledge that the present equity value of many stations is less than the capital expenditures that will be required for ATV conversion. In view of present market conditions, the Commission's all-UHF allotment proposal and 55-mile contour model, together with its lockstep conversion scheme, threaten to send the broadcast television industry into a steep downward spiral, from which many stations will not recover.

The ultimate losers are America's television viewers -- particularly those served by medium and smaller market stations. Those who are not literally disenfranchised as contours shrink -- or worse, as stations cease operations altogether -- will increasingly be deprived of locally produced news, public affairs and other programming, as stations shift resources away from these vital activities in order to cover the enormous costs of ATV conversion and operation.

The Commission should reconsider its proposal to implement an all-UHF allotment plan. It should reconsider its rejection of a "service replication/maximization" coverage objective. Above all, at this critical juncture the Commission <u>must</u> take into account the plight of the many television broadcasters whose licenses will be at risk because they lack the resources to comply with its conversion schedule.

The ultimate danger -- and irony -- is that the Commission's proposals for conversion to ATV -- a service that many stations simply cannot afford and that many viewers may not want -- will result in the loss of broadcast television service that is at the heart of the bedrock Commission policies of localism and diversity, and that for millions of viewers is essential and irreplaceable.

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OFFICE OF THE SECRETARY

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TO: The Commission

COMMENTS

The television stations listed in Attachment A (the "Stations") submit these comments in response to the Second Further Notice of Proposed Rulemaking, 7 FCC Rcd 5376 (rel. August 14, 1992) ("Second Further Notice"). In the Second Further Notice, the Commission proposed and requested comment on the policies and technical criteria that will guide allotment of channels for ATV deployment.

The Stations fully support the Commission's objectives to have an allotment/assignment process in place at the time an ATV transmission standard is adopted and to define the policies and technical criteria for the allotment/assignment process as early as possible. Second Further Notice at ¶ 4. However, the Stations are concerned that the Commission's proposal to use only the UHF band for ATV allotments and to provide only a 55-mile "minimum" ATV service area will so limit NTSC and ATV audiences that consumer acceptance of the new technology will be severely curtailed. Of even greater concern is the danger that the enormous costs imposed by the Commission's lockstep timetable for ATV conversion, and restrictions on broadcasters' ability to utilize ATV technology to generate new revenues, may have a devastating effect on local television markets. Especially in light of the significant expenses the Commission intends to impose on the broadcast industry over the next six years, its policies must be sensitive to enhancement, not curtailment, of broadcasters' audience reach and utilization of their conversion channel, and their concomitant ability to generate sufficient new revenue to pay for initiation of ATV service.

I. ATV ALLOTMENT DECISIONS MUST BE SENSITIVE TO THE COMPETITIVE REALITIES OF THE BROADCAST TELEVISION MARKETPLACE

The enormous capital strain on broadcast television licensees stemming from the Commission's rigid timetable for mandatory ATV implementation will be exacerbated by the allotment proposal outlined in the Second Further Notice. As discussed below, the all-UHF allotment scheme, together with the 55-mile service area proposal, will result in increased costs and diminished revenues for many stations. Furthermore, restrictions on licensees' ability to use their conversion channel to generate new revenue streams will impose an additional constraint on their already diminished ability to compete with multichannel program services and to fulfill their public interest obligations.

A. The Costs of ATV Conversion Will Force Broadcasters To Divert Scarce Resources From Responsive Programming And Other Public Service Activities

Estimates of ATV conversion costs vary widely. 1/ What is certain, however,

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1/ Preliminary studies forecast likely costs ranging from approximately $1 million (for construction of a "basic" ATV facility capable of passing through a network ATV signal and inserting local commercial material) to nearly $14 million (for a comprehensive ATV facility capable of syndicated program recording and playback, network program timeshifting, and local news and program production). *See* Darby Report at 5-19 (summarizing findings of PBS and CBS cost analyses). ATV cost forecasts are necessarily imprecise because they must continue to account for a significant number of variables that are not easily quantifiable. These include questions concerning the feasibility of using existing broadcast towers, programming costs and, most important, the rate and extent of consumer acceptance of ATV receivers. Notwithstanding the Commission's confidence that consumers will hurry to embrace the supposed benefits of ATV technology, the fact remains "that we are estimating the investment costs of serving a market which does not now exist, for which enormous complementary investments are required . . . , and for which technical and related regulatory parameters have only been sketched out." *Id.* at 4.

is that the Commission's ATV conversion proposals will impose significant new capital demands and business risks on the broadcast segment of the video marketplace.

The Commission's confident assertion that its six-year application and construction period will afford licensees sufficient flexibility to secure financing is dangerously shortsighted. It fails, first, to address the likely adverse impact on station values of reduced service contours and corresponding declines in advertising revenues. 2/ It fails to take into account the increased costs of operating both NTSC and ATV facilities during the transition period. Most important, it ignores the present realities of television broadcasting -- increased competition, declining audience shares, decreased cash flows and lower sales multiples. Not only is debt financing very hard to secure even without the pressures of mandatory ATV conversion, but the added demands of ATV conversion costs are likely also to dry up sources of equity funds. After all, equity investors typically demand a satisfactory return on their investment within four-to-six years. Yet, all they can count on as a result of the Commission's proposals is a significant additional capital investment within this timeframe without any corresponding increase in revenues.

The Stations are especially concerned that, in view of the enormous risks inherent in the implementation of an untested technology for which consumer demand is, at best, uncertain, the Commission has failed to provide an adequate public interest rationale for its imposition of a rigid unitary ATV conversion timetable. Because the Commission's conversion schedule makes no distinctions based on stations' size or financial strength, smaller market stations will be disproportionately burdened by conversion and implementation costs. Their viewers, moreover, will be less likely to invest in ATV receivers.

2/ In this respect, the Commission's acknowledgment that its UHF packing plan "could affect the current market position of the existing VHF stations" (*Second Further Notice* at ¶ 20) is a significant understatement.

Thus, these stations, which are least able to afford it, will bear a higher percentage of the risk of ATV failure than their bigger, more stable counterparts.

Indeed, examining the implications of the Commission's timetable across television markets reveals that in all but the very largest markets the costs of ATV implementation will send many, if not most, licensees into a death spiral -- while their multichannel non-broadcast competitors watch from the sidelines. The multi-million dollar costs of conversion and the additional costs of dual NTSC/ATV operation will impose a major financial strain even on relatively healthy stations in the top-fifty markets. And the downward spiral spins faster as market size gets smaller. Thus, what will be a serious struggle for stations in markets 50-100 will likely be a near impossibility for their counterparts in markets 100-150. The most precariously situated stations -- those in markets 150-217 -- face a totally bleak future. For many, the capital expenditures that will be required for ATV implementation will actually <u>exceed</u> their equity value. In view of current revenue levels and market conditions, the extraordinary expense of mandatory conversion could, quite literally, put them out of business.

Furthermore, when conversion becomes a certainty (as it appears it will) and stations begin to gear up for implementation, available capital understandably will flow to successful major market stations, with little likely to trickle down to the less stable medium and smaller market stations whose finances are even more insecure. As illustrated below, jeopardizing these stations' operations by imposing additional cost burdens raises a serious question regarding their long-term viability and, ultimately, the future availability of free, over-the-air television for a significant percentage of the American population.

The continuing (and perhaps irreversible) downturn in the broadcast market segment, punctuated by a large (and growing) number of loan defaults and bankruptcies by television stations, 3/ is evidence that many licensees simply will not be in a position to increase their borrowing by the multiple millions of dollars required for ATV implementation under the Commission's timetable. Forcing licensees to incur a significantly increased debt load in connection with ATV conversion costs will result in further reductions in the level and quality of local television service, already jeopardized by poor station performance in the face of a bad economy and competitive inroads by multichannel competitors. There is little doubt that news and public affairs programming, which traditionally has been, and remains even in today's diverse and competitive video marketplace, local broadcasters' unique contribution to the public interest, will be adversely impacted.

As an illustration, consider the financial and public interest costs of the Commission's proposals for KWCH-TV and its viewers in western Kansas. KWCH, Channel 12, is a CBS affiliate licensed to Hutchinson, Kansas. KWCH also serves vast rural portions of western Kansas with commonly-owned VHF satellite stations licensed to Ensign, Goodland and Hays, Kansas. Consequently, the FCC's mandatory conversion scheme would subject KWCH's owners to the costs of refitting not just one, but four stations -- three of which are located in markets that cannot even support a full service television station. Meanwhile, as a result of the stations' shrunken service contours during and following conversion -- or, if KWCH's owners are unable to finance ATV implementation and are stripped of their licenses, no service at all -- many viewers in the uncabled rural areas these stations presently serve would be literally disenfranchised. With the loss of service from KWCH's satellite operations residents in rural western Kansas would lose an irreplaceable source of news and informational programming.

3/ The Commission has found that, in 1989, "at least 25 percent of stations in the top ten markets experienced losses; aggregate losses occurred in most markets below the top 100; and at least 50 percent of independents in all market classes below the top ten experienced losses." *Notice of Proposed Ruelmaking, Regulations Governing Television Broadcasting*, 7 FCC Rcd 4111, 4112 (1992) (*emphasis added; footnote omitted*).

Stations like KWCH and its satellites -- and, as noted below, they are not unique -- face a Hobbesian choice: they can suffer a slow painful death from the severe capital strains of mandatory ATV conversion and reduced revenue streams during and following conversion; or they can commit suicide by simply electing not to convert and losing their licenses. Either way, it is clear that the ultimate costs of the Commission's ATV proposals would be borne by viewers, through a loss of service and a further diminution in the value and long-term viability of free, over-the-air television. Such a perverse result would be completely contrary to the Commission's efforts to revitalize the broadcast segment of the video marketplace and, more fundamentally, to the bedrock communications policy goals of localism, diversity and competition.

Indeed, the magnitude of the costs that will be imposed on licensees by the Commission's rigid ATV conversion timetable and allotment proposals is difficult to reconcile with the FCC's ongoing steps to ameliorate the competitive and financial disadvantages confronting many television broadcasters. 4/ Mandating the enormous costs associated with ATV conversion without addressing the competitive and financial disadvantages of television licensees, particularly vis-a-vis their multichannel competitors, is contrary to the

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4/ The Commission has acknowledged that:

- Broadcast television stations and networks have experienced sharply declining audience shares and advertising revenues.
- Broadcast station profits have "declined steadily" over the last eight years. "Real profits for the average affiliate and average independent station have fallen 21 percent and 68 percent, respectively," during that period.
- Losses "have become the norm" in most of the broadcast television industry.
- Over-the-air television will continue to "face increasing competitive pressure from multichannel media with dual revenue streams."

Regulations Governing Television Broadcasting, 7 FCC Rcd at 4112.

Commission's stated objective to "lessen[ ] the regulatory burden on television broadcasters as they seek to adapt to the multichannel video marketplace." *Id.* at 4111. 5/

Ultimately, it is grossly unfair -- and shortsighted -- to compel smaller market licensees to march in lockstep with their major market counterparts in the introduction of ATV. Particularly in view of the continuing uncertainty regarding the ultimate commercial viability of ATV, these licensees should remain free to respond to the demands of the market, and to determine whether and when to implement this technology.

B. The Commission Must Not Foreclose Flexibility In Broadcasters' Utilization Of Their Conversion Channel

The practical result of the Commission's ATV proposals is that over-the-air broadcasters -- alone among all participants in the video marketplace -- will be subjected by regulatory fiat to the substantial costs of conversion and implementation while the Commission ascertains whether ATV will gain consumer acceptance. The Stations therefore urge the Commission to ensure that broadcasters retain sufficient flexibility in the use of their conversion channel to offset the enormous costs of ATV implementation with opportunities to enhance operating revenues.

The Commission's current conversion scenario arbitrarily limits broadcasters' opportunities to enhance their competitive position by taking advantage of the technological advances that make ATV transmissions possible. Such opportunities could include, for example, utilization of digital compression technology to multiplex NTSC programming or to distribute other information (say, on a subscription basis) on the conversion channel. Permitting multichannel operation would enable broadcasters to compete more effectively

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5/ The Commission has proposed "a number of structural ownership and network-related rules for which specific changes hold some promise of strengthening the potential of over-the-air television broadcasters to serve the public." *Id.* at n.4. These include changes in the multiple and cross-ownership rules, provisions regarding time brokerage by television stations, and various rules restricting the freedom of networks to contract with their affiliates.

with multichannel providers and, in the process, to recoup some of the enormous costs of ATV implementation. It also would benefit the public interest by contributing to viewpoint diversity while enhancing spectrum utilization.

The technology that will make ATV transmissions possible ultimately may have greater value, both to broadcasters and to viewers, than can be realized by the mere transmission of high definition versions of existing programming. Permitting the market to determine the best, most highly valued use for this technology would benefit the public by enabling licensees to generate additional revenue and remain competitively viable -- and by making possible a more stable over-the-air television industry. Accordingly, the Stations urge the Commission not to deny broadcasters flexibility in their use of ATV technology and their conversion channel during the transition period.

II. THE ALL-UHF ALLOTMENT PLAN AND THE 55-MILE AREA SERVICE PROPOSAL WILL CRIPPLE THE ATV SERVICE

Even assuming that most stations could afford to implement the new technology, the ultimate success of ATV depends on broadcasters' ability to reach their entire current NTSC audience with an ATV signal (and, during the 15-year transition period, with an interference-free NTSC signal). This is so for two reasons. First, ATV's success depends on achievement of a critical mass in consumer acceptance of ATV and purchase of ATV receivers. If the universe of potential ATV receiver purchasers is reduced because some significant fraction of the audience cannot receive ATV signals, then, by definition, achievement of the needed critical mass will be handicapped.

Moreover, at the same time that broadcasters are being forced to expend huge sums to convert their operations, an inability to reach their entire existing audience during the critical transition period with both an interference-free NTSC signal and an ATV signal will actually <u>reduce</u> station revenues. As discussed above, especially because TV revenues and profitability already have been in decline, 6/ the Commission must be cautious that its actions to implement the new ATV service do nothing to reduce broadcasters' financial ability to deploy it.

A. Elimination of the VHF Band for ATV Deployment Will Reduce ATV and NTSC Service

Allotting all ATV channels to the UHF band, as the Commission has proposed, means ATV stations will be spaced closer to each other and to NTSC stations. The obvious result will be less extensive ATV service and more NTSC interference than would be the case if the VHF band were also used for ATV channel allotment. Thus, the Commission's all-UHF plan will result directly in the twin evils the Stations fear will cripple ATV before it even leaves the starting gate -- decreased opportunity for consumer ATV acceptance and decreased broadcaster revenues for ATV implementation and operation.

The interest motivating the Commission's all-UHF plan may be achievable only at the risk of jeopardizing the entire ATV experiment. In a footnote to the Second Further Notice the Commission noted that the "proposal to allot ATV channels only to UHF frequencies would leave the VHF channels vacant after the transition to ATV is completed. This would make that band available for new radio frequency services." Second Further Notice at ¶18 n.24. The Stations caution the Commission that, though the prospect of clearing out VHF spectrum is seductive, the cost of attaining it is to jeopardize the future of ATV and quite possibly the future of free over-the-air broadcasting.

The UHF-only proposal also is irreconcilable with decisions already made in this docket and the public interest findings underlying them. An early premise asserted by the Commission for going forward with ATV implementation was its "conclu[sion] that broadcasters should be permitted to utilize ATV transmission techniques within the existing VHF and UHF

6/ *See Review of the Commission's Regulations Governing Television Broadcasting,* 7 FCC Rcd at 4112.

bands to the extent that this use can be accommodated and that continued broadcasting service to the public is not disrupted, including service to those viewers with NTSC receivers." 7/ Because the Commission's UHF packing plan will result in significant NTSC interference -- and, following conversion, in service degradation and revenue losses under an ATV regime -- it is contrary to the Commission's own earlier iterations of the public interest.

The Commission has neither sought nor offered a persuasive public interest rationale for universally displacing broadcasters from the VHF band. It has not offered any reasoned explanation for departing from an allotment plan that attempts to replicate existing service. The result will be an arbitrary reduction in the quality and extent of free, over-the-air television service to millions of American viewers, at the same time that the Commission is effectively mandating significant consumer investment in ATV equipment. The Stations therefore urge that the Commission reconsider its decision and reserve the UHF and VHF bands for ATV allotments.

With VHF spectrum available for allotment, ATV-to-ATV and ATV-to-NTSC spacings could be increased, resulting in larger ATV service areas and less ATV interference to NTSC service. These results would serve the public interest in several respects:

- By preserving NTSC service until ATV receiver penetration grows;
- By increasing ATV program service to the public;
- By creating a greater opportunity for achievement of the necessary critical mass of ATV receiver penetration; and
- By allowing broadcasters to retain audience reach essential to maintaining adequate revenue to finance ATV equipment purchase and operation.

7/ *Tentative Decision and Further Notice of Inquiry, Advanced Television Systems,* 3 FCC Rcd 6520,6525 (1988).

Ultimately, such a plan would preserve for licensees the promised option to choose (upon a sufficient showing of non-interference) at the end of the 15-year transition period whether to continue ATV operation on the ATV or the NTSC frequency. 8/

B. The Proposed 55-Mile "Minimum" Service Area Will Leave Significant Areas and Populations Without ATV Service

As the Commission is well aware, 60 percent of today's NTSC television stations have service contours with radii that exceed 55 miles. For these stations, and to a lesser extent for their smaller competitors, the Commission's proposal to "guarantee" a 55-mile "minimum" coverage radius amounts to little more than a promise of reduced service, lost audience and, consequently, decreased revenue.

Although it cannot be asserted with certainty until the ongoing ATV system proposal tests are completed and until other critical coverage criteria such as tower height and power are established, it is highly probable that the Commission's proposed effort to give every station a minimum 55-mile service radius will effectively limit the service area of every ATV station to a 55-mile maximum radius. In attempting to assure stations in congested areas of the "minimum" coverage, other stations' "maximum" service areas necessarily must be compromised to provide the guaranteed minimum coverage. Moreover, even the limited preliminary data associated with the Second Further Notice indicate that achievement of the 55-mile "minimum" service area is not feasible in light of the Commission's proposed mileage separations. 9/

8/ *See Second Report and Order/Further Notice of Proposed Rulemaking, Advanced Television Systems,* 7 FCC Rcd 3340, 3355 (1992) ("we will permit switching of ATV and NTSC frequencies only on a case-by-case basis, after careful coordination insuring that other ATV service areas are not adversely affected and no other negative interference consequences result . . .").

9/ For example, the Commission proposes to space ATV to ATV co-channel stations 125 miles apart. *Second Further Notice* at ¶ 28. However, the system proponents have estimated that with such co-channel spacing, the range of the service areas of their systems is from 51 to 52 miles. *Id.*, Appendix B. Likewise, whereas the Commission proposes 115 mile separation

[Footnote continued]

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While there are numerous examples of the potentially devastating effects of the Commission's "minimum" 55-mile service radius proposal, a striking case is the situation of WMTW, Channel 8, an ABC affiliate licensed to Poland Spring, Maine. WMTW's transmitter is located on Mount Washington, in New Hampshire, some 55 miles from its community of license. If a 55-mile service radius were to be imposed on WMTW, service from its current transmitter site to its community of license would be doubtful, and service to a majority of its current viewers would be out of the question: according to the station, fully 57 percent of the population presently within WMTW's predicted Grade B contour would fall outside a 55-mile service radius, and even viewers within it would be subject to loss of service because of shadowing problems suffered by UHF stations operating in mountainous terrain.

Moreover, random assignment of ATV Channel 64 to WMTW as proposed in the Commission's draft ATV Table of Allotments 10/ would severely impair the station's ability to cover even a 55-mile service area. Because there is no electrical service to its transmitter site, WMTW's transmitter is powered by an on-site generator. In order to meet the additional power requirements inherent in high-band UHF transmission, WMTW believes it would have to increase the amount of power it generates by between 3 and 15 times its present requirements. This in turn would require substantial modification and expansion of the station's existing oil storage and generator facilities on Mt. Washington, which could only be accomplished, if at all, over the strenuous objection of the New Hampshire State Park System.

As a result of this combination of service reductions and additional expenses, much of northern New Hampshire would lose its only source of free over-the-air television. Meanwhile,

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[Footnote continued]

between ATV to NTSC co-channels (*id.*at ¶ 28), the system proponents estimate the range of service contours to be 45 to 55 miles at that distance. *Id.*, Appendix A.

10/ *See Second Further Notice* at D-16.

WMTW's remaining viewers likely would have reduced access to locally produced news and public affairs programming, as the station would be forced to cut back its issue-responsive programming and other community service activities in order to absorb the enormous capital strain of ATV conversion and reduced advertising revenues.

The Stations urge the Commission not to adopt the 55-mile "minimum" service radius objective as proposed. Instead, the Stations believe the Commission should make allotments based on a "service replication/maximization" plan such as that proposed by the ATV Advisory Committee and the Joint Broadcasters and set out in the Second Further Notice at ¶¶ 11-16. Although the Commission has expressed its tentative belief that, in "a significant number of cases," licensees may "not be satisfied with the allotments and assignments [a service replication/maximization] plan would produce" (*id.* at ¶ 14), it is hard to believe that the number would approach or exceed the 60 percent of today's licensees who will be not only "dissatisfied" but substantially disenfranchised by being forced to operate with a reduced service area.

III. CONCLUSION

This Commission, which consistently has recognized the value of market forces in preserving and facilitating a vibrant, competitive video marketplace, has imposed a massive and high risk restructuring on the broadcast television segment of that marketplace. For many stations, the unrecouped costs of conversion, and the additional burdens of the all-UHF and the 55-mile contour proposals are potentially fatal. Reduced service areas and limited flexibility in the use of the conversion channel will result in further declines in audience shares and advertising revenues. ATV conversion costs will increase debt loads, which in turn may lead to reductions in public service programming, and ultimately to more bankruptcies and station failures.

The Commission's conversion campaign is impossible to square with its efforts to level the playing field for over-the-air broadcasters. In view of the many uncertainties that continue to surround the ultimate success of ATV, sacrificing the VHF spectrum -- the traditional home base for over-the-air television -- while arbitrarily reducing the level of service provided by television licensees, could very well signal the *de facto* dismantling of broadcast television as a competitively viable information and entertainment medium. Plunging headlong down the road to an all-UHF, limited ATV service could have disastrous, and possibly irreparable, consequences for the future of broadcast television -- and for the millions of American viewers for whom its voice is crucial and irreplaceable.

Respectfully submitted,

HOGAN & HARTSON

By [signature]
William S. Reyner, Jr.
Susan Wing
Mace J. Rosenstein

Attorneys for the 25 Stations
Listed in Attachment A

Dated: November 16, 1992

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ATTACHMENT A

KBSD-TV	Ensign, Kansas
KBSH-TV	Hays, Kansas
KBSL-TV	Goodland, Kansas
KEYT-TV	Santa Barbara, California
KOVR-TV	Stockton, California
KTNV	Las Vegas, Nevada
KTVO-TV	Kirksville, Missouri
KWCH-TV	Hutchinson, Kansas
WATM-TV	Altoona, Pennsylvania
WAXA-TV	Anderson, South Carolina
WCFT-TV	Tuscaloosa, Alabama
WDAM-TV	Hattiesburg, Mississippi
WETM-TV	Elmira, New York
WHTM-TV	Harrisburg, Pennsylvania
WKTV	Utica, New York
WLOS	Asheville, North Carolina
WMTW-TV	Poland Spring, Maine
WLUC-TV	Marquette, Michigan
WPBN-TV	Traverse City, Michigan
WSTM-TV	Syracuse, New York
WSYM-TV	Lansing, Michigan
WSYX-TV	Columbus, Ohio
WTMJ-TV	Milwaukee, Wisconsin
WTOM-TV	Cheboygan, Michigan
WWCP-TV	Johnstown, Pennsylvania